

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION  
Case No.: 9:23-cv-81150-RLR**

ANDREW TATE AND TRISTAN TATE,

Plaintiffs

vs.

EMMA GABBEY, MONA TABARA GABBEY,  
WILLIAM GABBEY, ALIONA UNTILA,  
AND MATTHIEU MARTELLY

Defendants.

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**MOTION TO APPEAR *PRO HAC VICE*, FOR ATTORNEY BENJAMIN W. BULL,  
CONSENT TO DESIGNATION, AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rule 4(b), the undersigned respectfully moves for the admission *pro hac vice* of Benjamin W. Bull of the National Center On Sexual Exploitation, 1201 F. ST NW, Suite 200, Washington D.C. 20004, p. 202-393-7245, for purposes of appearance as co-counsel on behalf of Defendants Emma Gabbey, Mona Tabara Gabbey, William Gabbey, Aliona Untila, and Matthieu Martelly in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Benjamin W. Bull to receive electronic filings in this case, and in support thereof states as follows:

1. Benjamin W. Bull is not admitted to practice in the Southern District of Florida and is a member in good standing of the District of Columbia Bar and the United States District Court for the District of Columbia.
2. Movant, Christian W. Waugh, Esquire, of the law firm of Waugh PLLC, 201 E. Pine Street, Suite 315, Orlando, FL 32801, p. 321-800-6008, is a member in good standing of The

Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Benjamin W. Bull has made payment of this Court's \$200 admission fee. A certification in accordance with Local Rule 4(b) is attached hereto.

4. Benjamin W. Bull, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Benjamin W. Bull at email address: **bbull@ncose.com**.

WHEREFORE, the undersigned moves this Court to enter an Order Benjamin W. Bull, to appear before this Court on behalf of the Defendants, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Benjamin W. Bull.

Date: August 18, 2023

/s/ Christian W. Waugh  
Christian W. Waugh [FBN 71093]  
Mary A. Norberg [FBN 1032028]  
Sofie Bayer [FBN 1039616]  
**WAUGH PLLC**  
201 E. Pine Street, Suite 315  
Orlando, FL 32801  
cwaugh@waugh.legal  
mnorberg@waugh.legal

sbayer@waugh.legal  
Telephone: 321-800-6008  
Fax: 844-206-0245

*Co-Counsel for Defendants*